

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
MCALLEN DIVISION

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| FEDERICO FLORES, JR., | § | |
| MARIA GUERRERO, and | § | |
| VICENTE GUERRERO, | § | |
| Plaintiffs, | § | |
| | § | |
| | § | CIVIL ACTION NO.7:18-cv-113 |
| | § | |
| v. | § | |
| | § | |
| TEXAS SECRETARY OF STATE and | § | |
| ARMANDINA MARTINEZ, ALMA | § | |
| GARCIA, ALICIA DOUGHERTY NO. | § | |
| 1, ALICIA DOUGHERTY NO. 2, | § | |
| YOLANDA MARTINEZ, | § | |
| Defendants. | § | |

ORAL DEPOSITION OF

MARIA GUERRERO

JULY 25, 2019

ORAL DEPOSITION OF MARIA GUERRERO, produced as a witness at the instance of the Defendant, and duly sworn, was taken in the above-styled and -numbered cause on the July 25th day of July, 2019, from 12:01 p.m. to 12:38 p.m., before TOI K. DOWELL, CSR, in and for the State of Texas, reported by machine shorthand at the home of Vicente Guerrero and Maria Guerrero, 19 Florez Street, Roma, Texas, 78584 pursuant to the Federal Rules of Civil Procedure and the provisions stated on the record or attached hereto.

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| <p>1 APPEARANCES</p> <p>2</p> <p>3 FOR THE PLAINTIFFS:</p> <p>4 Ms. Marty Vela</p> <p>5 NAJVAR LAW FIRM</p> <p>6 2180 North Loop West, Suite 255</p> <p>7 Houston, Texas 77018-8014</p> <p>8 Phone (281) 404-4696</p> <p>9 Email: jerad@najvarlaw.com</p> <p>10</p> <p>11 FOR THE DEFENDANTS:</p> <p>12 Mr. Michael R. Abrams</p> <p>13 ASSISTANT ATTORNEY GENERAL</p> <p>14 Office of the Attorney General-019</p> <p>15 General Litigation Division</p> <p>16 Post Office Box 12548, Capitol Station</p> <p>17 Austin, Texas 78711-2548</p> <p>18 Phone: (512)463-2120</p> <p>19 Email: michael.abrams@oag.texas.gov</p> <p>20</p> <p>21 Mr. Jose Garza</p> <p>22 GARZA GOLANDO MORAN</p> <p>23 405 North Saint Mary's Street, Suite 700</p> <p>24 San Antonio, Texas</p> <p>25 Phone: (210)892-8543</p> <p>26</p> <p>27 ALSO PRESENT: Nelson Troncoso, Interpreter</p> <p>28</p> <p>29</p> <p>30</p> <p>31</p> <p>32</p> <p>33</p> <p>34</p> <p>35</p> | <p>4</p> <p>1 (The Interpreter was duly sworn)</p> <p>2 MARIA GUERRERO,</p> <p>3 having been first duly sworn, testified as follows:</p> <p>4 EXAMINATION</p> <p>5 BY MR. ABRAMS.</p> <p>6 Q Good afternoon. Can you please state your name for</p> <p>7 the record.</p> <p>8 A Marie Rosa Guerra.</p> <p>9 Q My name is Michael Abrams, and I represent the</p> <p>10 Texas Secretary of State in this case.</p> <p>11 A Okay.</p> <p>12 MR. JOSE GARZA: I'm Jose Garza, and I</p> <p>13 represent several of the defendants.</p> <p>14 Q (By Mr. Abrams) Ms. Guerrero, have you ever been</p> <p>15 deposed before?</p> <p>16 A Never.</p> <p>17 Q So I just want to go over a few of the, sort of,</p> <p>18 ground rules of how depositions work just to help us go</p> <p>19 smoothly.</p> <p>20 A Okay.</p> <p>21 Q So one thing is to give clear, verbal answers to</p> <p>22 the questions rather than shaking your head, and that's so</p> <p>23 that the court reporter can get a clear record of what's</p> <p>24 happening.</p> <p>25 And obviously we are working through a translator,</p> |
| <p>3</p> <p>1 INDEX</p> <p>2</p> <p>3 Appearances..... 2</p> <p>4 MARIA GUERRERO</p> <p>5 Examination by Mr. Abrams..... 4</p> <p>6 Examination by Mr. Garza..... 15</p> <p>7 Examination by Ms. Vela..... 19</p> <p>8 Examination by Mr. Garza..... 20</p> <p>9 Changes and Signature Page..... 21</p> <p>10 Reporter's Certificate..... 23</p> <p>11 EXHIBITS</p> <p>12 NO. DESCRIPTION PAGE</p> <p>13 1 Declaration 7</p> <p>14 2 Notice of Rejected Ballot 12</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p> | <p>5</p> <p>1 but please let me finish my question, and then have the</p> <p>2 translator finish the translation before you start, and then</p> <p>3 I will wait until you finish and the answer's been given</p> <p>4 before we move onto the next question.</p> <p>5 A Okay.</p> <p>6 Q And you understand that you are under oath today,</p> <p>7 and it is the same duty to speak the truth as if you were</p> <p>8 under oath in court?</p> <p>9 A Okay.</p> <p>10 Q If you need to take a break, please let me know. I</p> <p>11 don't think today's deposition is going to go very long; but</p> <p>12 if we ever need to take a break, just let us know and we'll</p> <p>13 find the time to take a break.</p> <p>14 A Okay.</p> <p>15 Q Have you ingested anything or taken any medication</p> <p>16 that would prevent you from understanding the questions that</p> <p>17 are being asked today?</p> <p>18 A Just -- just my medication for blood pressure and</p> <p>19 my heart.</p> <p>20 Q And so you are able to understand and respond to</p> <p>21 the questions that are being asked today; is that right?</p> <p>22 A Yes. Yes.</p> <p>23 Q Ms. Guerrero, what did you do to prepare for</p> <p>24 today's deposition?</p> <p>25 A Nothing. Just wait.</p> |

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| <p>6</p> <p>1 Q Did you review any documents prior to the 2 deposition?</p> <p>3 A No.</p> <p>4 Q Did you meet with any attorneys before the 5 deposition?</p> <p>6 A No.</p> <p>7 Q Ms. Guerrero, are you currently employed?</p> <p>8 A No.</p> <p>9 Q When was the last time you were employed?</p> <p>10 A Well, many years ago.</p> <p>11 Q What did you do?</p> <p>12 A Work on the fields. Lettuce.</p> <p>13 Q Okay. When did you move to Starr County?</p> <p>14 A It's been like 40 years already.</p> <p>15 Q And were you born in Starr County?</p> <p>16 A No. In Mexico, but I became a United States 17 citizen already.</p> <p>18 Q And when did you become a United States citizen?</p> <p>19 A I don't remember the date, but it's been like 20 20-something years ago. I'm not quite sure how many years.</p> <p>21 Q And Ms. Guerrero, are you married?</p> <p>22 A Yes.</p> <p>23 Q And your husband is Vicente Guerrero?</p> <p>24 A Yes.</p> <p>25 Q How long have you been married?</p> | <p>8</p> <p>1 the attorney over here, every time I sign, I don't write my 2 complete name, Rosa. I just put the R.</p> <p>3 Q And do you see the handwriting on Bullet 4?</p> <p>4 A This right here (indicating)?</p> <p>5 Q Yes.</p> <p>6 A Yes. It's in English, right?</p> <p>7 Q Did you write this?</p> <p>8 A No, no. I don't know how to write like this.</p> <p>9 Q Okay. Well, what it says is that you were home 10 with your husband when you voted in the March 2018 primary 11 election, and that we both signed the application and the 12 ballot envelope.</p> <p>13 A Yes, uh-huh.</p> <p>14 Q So is that statement accurate?</p> <p>15 A Well, not mine nor my husband's either.</p> <p>16 Q I'm sorry. What do you mean by that?</p> <p>17 A What do you mean?</p> <p>18 THE INTERPRETER: You're asking if that's 19 correct?</p> <p>20 MR. ABRAMS: Yeah, if that statement is 21 correct.</p> <p>22 A Okay. Well, I don't know. I did not write this.</p> <p>23 Q (By Mr. Abrams) Okay. Let me -- I can take a step 24 back.</p> <p>25 Ms. Guerrero, are you eligible to vote in Starr</p> |
| <p>7</p> <p>1 A Sixty years. Too much.</p> <p>2 Q And do you have any children?</p> <p>3 A Yes.</p> <p>4 Q How many children?</p> <p>5 A Four. Two males and two females. Yesterday was 6 five months that one of my daughters passed away.</p> <p>7 Q I'm very sorry -- sorry for that.</p> <p>8 A Thank you.</p> <p>9 Q Ms. Guerrero, what -- what claim -- well, I mean -- 10 let me back up.</p> <p>11 Are you the plaintiff in a lawsuit brought against 12 the Secretary of State and various officials for the early 13 ballot -- ballot written board?</p> <p>14 A Yes.</p> <p>15 Q And what claims are you bringing in this lawsuit?</p> <p>16 A Because they are saying that that is not the 17 signature for that vote, but that is the signature. 18 (M. Guerrero Exhibit No. 1 was marked.)</p> <p>19 Q (By Mr. Abrams) I've handed you what we'll mark as 20 Exhibit 1 of your deposition which -- oh -- which I'll 21 represent to you is a Declaration that you have given in 22 this case.</p> <p>23 Can you please review the Declaration and verify 24 that this is your signature on the bottom?</p> <p>25 A Oh, yes, this is me. Like I was telling Mrs. -- to</p> | <p>9</p> <p>1 County?</p> <p>2 A Yes.</p> <p>3 Q And are you registered to vote in Starr County?</p> <p>4 A Yes.</p> <p>5 Q And do you ever vote in person?</p> <p>6 A Yes. At the beginning.</p> <p>7 Q And do you ever vote by mail?</p> <p>8 A Yes. Several times.</p> <p>9 Q In the March 2018 primary elections, did you vote 10 by mail or submit -- did you submit an application to vote 11 by mail?</p> <p>12 A My, gosh, I don't remember that well, but I think 13 so. It's been, like, two or three years that I've been 14 voting by mail.</p> <p>15 Q Turn to the next page of this document. 16 Do you recognize this document?</p> <p>17 THE INTERPRETER: This one.</p> <p>18 A This one right here (indicating)?</p> <p>19 Q (By Mr. Abrams) Yes.</p> <p>20 A Okay. I see my signature here, too.</p> <p>21 Q If you look at Box 10 -- yeah, it's at the bottom 22 there.</p> <p>23 A This one right here.</p> <p>24 Q Is that your signature?</p> <p>25 A And this is my phone number.</p> |

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| <p style="text-align: right;">10</p> <p>1 Q And do you see where you've signed your name in Box 2 10?</p> <p>3 A Right here?</p> <p>4 Q Yes.</p> <p>5 A Yes.</p> <p>6 Q Is that your signature?</p> <p>7 A Yes.</p> <p>8 Q And I notice that you didn't -- your last name 9 doesn't have your full -- it doesn't state your full name. 10 Is there a reason for that?</p> <p>11 A Guerrero, yes, it's there. Guerrero.</p> <p>12 Q If you go back to the first page of your 13 Declaration, it says that you -- it says that you left out 14 some letters of your last name because you did not want to 15 write over the word "date."</p> <p>16 A Oh, yes. Yes.</p> <p>17 Q So if you look back on the next page, on Page 2.</p> <p>18 A This one? Yeah, because I didn't want to write 19 over this; so, that's why I wrote it like this.</p> <p>20 Q So you did leave off a few letters of your last 21 name in your signature?</p> <p>22 MS. VELA: Objection, form.</p> <p>23 A Just an R. That's it, or is it --</p> <p>24 Q (By Mr. Abrams) And if you turn to the last page 25 of the exhibit, do you recognize this document?</p> | <p style="text-align: right;">12</p> <p>1 Q I'm not trying to ask any conversations you had 2 with the attorney, but can you tell me who the attorney was?</p> <p>3 A Well, he gave me his name but I forgot.</p> <p>4 Q Was his name maybe Jared Najvar?</p> <p>5 A I can't remember.</p> <p>6 (M. Guerrero Exhibit No. 2 was marked.)</p> <p>7 Q (By Mr. Abrams) I want to show you what we'll mark 8 as Exhibit 2. And I'll represent that this is a Notice of 9 Rejected Ballot from the Early Voting Ballot Board. 10 Do you recognize this document?</p> <p>11 A I don't remember -- remember about this one. 12 March 6th? I don't think this is my writing here because it 13 doesn't even have the R here.</p> <p>14 Q And I'll tell you, this is a notification to you 15 that your ballot had been rejected.</p> <p>16 A Oh.</p> <p>17 Q Do you recall receiving this document?</p> <p>18 A No.</p> <p>19 Q So how do you recall learning when -- how do you 20 recall learning that your ballot in the March 2018 primary 21 was rejected?</p> <p>22 A Because the attorney came here. It was an attorney 23 and another lady.</p> <p>24 Q And do you recall who the other woman was?</p> <p>25 A No, I didn't -- I did not know her.</p> |
| <p style="text-align: right;">11</p> <p>1 A Yes, because this is my signature.</p> <p>2 Q Do you recognize this as a ballot envelope?</p> <p>3 A Yes. It can -- and this three.</p> <p>4 Q And you signed the ballot envelope with your 5 signature on the -- in the middle of the page there?</p> <p>6 A Where?</p> <p>7 Q At the top of the page?</p> <p>8 A Right here? Yes, this is my signature right here, 9 and this one over here (indicating).</p> <p>10 Q Do you recall after submitting or -- do you recall 11 after signing your ballot application and signing the 12 envelope and you put the envelope in the mail or gave it to 13 another individual to put in the mail -- what -- what did 14 you do with the envelope once you signed it?</p> <p>15 A We put it in the mail. Well, now I don't remember 16 if we put it in the mail or we gave it to the girl; but it 17 was already packed or closed.</p> <p>18 Q Okay. And when you say, "gave it to the girl," who 19 is that?</p> <p>20 A I do know her, but I don't remember her name. It's 21 just when they come here, just for this purpose.</p> <p>22 Q Do you recall receiving a notification that your 23 ballot had been rejected?</p> <p>24 A Yes. Well, that was when the attorney came here, 25 and the other girl.</p> | <p style="text-align: right;">13</p> <p>1 Q Did you reach out to the woman and the attorney 2 first, or did they reach out to you?</p> <p>3 A No. They -- they came over.</p> <p>4 Q Did you -- were you expecting them when they came 5 over?</p> <p>6 MS. VELA: Objection, form.</p> <p>7 A No. They suddenly showed up.</p> <p>8 Q (By Mr. Abrams) Do you recall when this was?</p> <p>9 A No, I don't have the date. They were here, but I 10 don't know when.</p> <p>11 Q Would you be able to say if it was about a couple 12 of months ago?</p> <p>13 A No. More than that.</p> <p>14 Q Has it been a year since then?</p> <p>15 A No, not that much; but more than the two months.</p> <p>16 Q So sometime between two months and a year ago you 17 received this visit?</p> <p>18 A Yes. They were here.</p> <p>19 Q And are you -- is it your testimony that at that 20 time you learned that your March 2018 ballot had been 21 rejected?</p> <p>22 MS. VELA: Objection, leading.</p> <p>23 A Yes.</p> <p>24 Q (By Mr. Abrams) And what did you do after that 25 meeting?</p> |

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| <p>14</p> <p>1 A Well, nothing.</p> <p>2 Q So after learning that your ballot had been</p> <p>3 rejected, did you reach out to anyone in the Starr County</p> <p>4 clerk's office?</p> <p>5 A No.</p> <p>6 Q Did you reach out --</p> <p>7 A No. I mean, I don't have -- you don't have any</p> <p>8 knowledge of none of it.</p> <p>9 Q Did you reach out -- after you learned that your</p> <p>10 ballot had been rejected, did you reach out to or speak with</p> <p>11 anyone in the Texas Secretary of State's office?</p> <p>12 A No.</p> <p>13 Q Did you -- other than the attorney and the woman</p> <p>14 who was at this meeting, did you speak with anyone about</p> <p>15 your ballot being rejected?</p> <p>16 A No.</p> <p>17 Q Ms. Guerrero, do you intend to vote in future</p> <p>18 elections?</p> <p>19 A Yes.</p> <p>20 Q Do you intend to vote by mail or to go in person?</p> <p>21 A Maybe I'll go in person. I don't want these</p> <p>22 problems anymore.</p> <p>23 Q So just to make sure I understand, it's your</p> <p>24 testimony that in the future you may go and vote in person</p> <p>25 instead of by mail?</p> | <p>16</p> <p>1 Q This is the application to receive a mail-in</p> <p>2 ballot. Is that -- is that what you understand?</p> <p>3 A Yes.</p> <p>4 Q And do you remember when Ms. Vela and -- was</p> <p>5 Ms. -- let me back up.</p> <p>6 Was Ms. Vela with more than one person?</p> <p>7 A No. It was two.</p> <p>8 Q Do you remember when they came to your house?</p> <p>9 A No, I don't remember which date when they -- they</p> <p>10 came.</p> <p>11 Q Okay. Did you know Ms. Vela?</p> <p>12 A I did not know her. I met her here.</p> <p>13 Q Okay. And do you remember the name of the -- of</p> <p>14 the woman that was with her?</p> <p>15 A No.</p> <p>16 Q Did -- did you already have the form at your house,</p> <p>17 or did they bring you the form?</p> <p>18 A They brought it to me, and they left it here.</p> <p>19 Q Okay. If you could, turn the page -- to the last</p> <p>20 page. And do you know a Barbara Barrios?</p> <p>21 A Oh, yes, I do know her, yes.</p> <p>22 Q And how do you know her?</p> <p>23 A I had met her here in the area before. She used to</p> <p>24 sell shoes.</p> <p>25 Q And do you remember if she came to your house?</p> |
| <p>15</p> <p>1 A Yes.</p> <p>2 Q Have you voted in any election since the March 2018</p> <p>3 primary?</p> <p>4 A No.</p> <p>5 MR. ABRAMS: Uno momento. Give me a minute.</p> <p>6 I speak a little Spanish.</p> <p>7 Q (By Mr. Abrams) Ms. Guerrero, have you understood</p> <p>8 the questions that I've asked you today?</p> <p>9 A Yes.</p> <p>10 Q And have I been courteous with you today?</p> <p>11 A Very courteous.</p> <p>12 MR. ABRAMS: Okay. We will pass the witness.</p> <p>13 MR. GARZA: And I just have a couple of</p> <p>14 questions -- follow-up questions.</p> <p>15 EXAMINATION</p> <p>16 BY MR. GARZA:</p> <p>17 Q First, if you could take a look again at the second</p> <p>18 page of the first exhibit that you were shown.</p> <p>19 A This one?</p> <p>20 Q There, on the bottom of the page, it says -- that</p> <p>21 is the name Modesta Vela.</p> <p>22 Do you know who Modesta Vela is?</p> <p>23 A That was -- that was one of the people that showed</p> <p>24 up here. They came here. This was when they brought the --</p> <p>25 the envelope.</p> | <p>17</p> <p>1 A Yes, she was here before. I never went to her</p> <p>2 house.</p> <p>3 Q And did you see her sign this form?</p> <p>4 A This one here? Yes.</p> <p>5 Q Okay. And did you give her -- was she here by</p> <p>6 herself, or did she come with other people?</p> <p>7 A With the other lady -- with that lady.</p> <p>8 Q So she came with Ms. Vela?</p> <p>9 A (Witness nods head.)</p> <p>10 Q They both came --</p> <p>11 MR. GARZA: So -- I'm sorry. If she could</p> <p>12 answer the question.</p> <p>13 A Yes.</p> <p>14 Q (By Mr. Garza) And so was the same two ladies that</p> <p>15 came -- that brought you the application that came when they</p> <p>16 picked up your ballot?</p> <p>17 A Yes.</p> <p>18 Q And did -- when you -- when you signed the</p> <p>19 application, did they take the application with them?</p> <p>20 MS. VELA: Objection, form.</p> <p>21 THE INTERPRETER: When they signed?</p> <p>22 MR. GARZA: When she signed.</p> <p>23 A Yes, they took it, but it was already -- the</p> <p>24 envelope was already closed.</p> <p>25 Q (By Ms. Garza) Did you put the stamp on the</p> |

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| <p>18</p> <p>1 application? We're talking about the application first.</p> <p>2 A You mean on the envelope?</p> <p>3 Q Yes.</p> <p>4 A No.</p> <p>5 Q And on the -- on the -- on the third page, where</p> <p>6 you signed for the ballot -- or where you voted, did you</p> <p>7 seal the envelope after you voted?</p> <p>8 A Yes.</p> <p>9 Q And did you put the stamp on the -- on the ballot</p> <p>10 envelope?</p> <p>11 A I didn't have any.</p> <p>12 Q And so did Ms. Barrios and Ms. Vela, did they take</p> <p>13 your ballot with them?</p> <p>14 A Yes.</p> <p>15 Q Did they witness how you voted?</p> <p>16 A No.</p> <p>17 Q Did -- when they came to pick up your ballot, did</p> <p>18 you already have your ballot, or did they bring you a</p> <p>19 ballot?</p> <p>20 A No. They brought it to me.</p> <p>21 Q Do you know how they got your ballot?</p> <p>22 MS. VELA: Objection, form.</p> <p>23 A No. They've always been involved working with</p> <p>24 ballots -- votes.</p> <p>25 Q (By Mr. Garza) So these two ladies have helped you</p> | <p>20</p> <p>1 FURTHER EXAMINATION</p> <p>2 BY MR. GARZA:</p> <p>3 Q And I'm sorry to ask. How old are you?</p> <p>4 A I'm going to be turning 80.</p> <p>5 MR. GARZA: All right. Thank you.</p> <p>6 MR. ABRAMS: I have no further questions.</p> <p>7 (Deposition concluded)</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p> |
| <p>19</p> <p>1 vote before?</p> <p>2 A Yes. The previous years, yes.</p> <p>3 Q And do you know if they had other ballots with them</p> <p>4 when they came to your house?</p> <p>5 A No. I didn't notice that.</p> <p>6 Q You didn't see them carrying other ballots with</p> <p>7 them?</p> <p>8 A No.</p> <p>9 Q And when they brought the application for you, did</p> <p>10 you notice whether they had other applications with them?</p> <p>11 A No.</p> <p>12 MR. GARZA: I don't have any other questions.</p> <p>13 MS. VELA: I just have a few questions.</p> <p>14 EXAMINATION</p> <p>15 BY MS. VELA:</p> <p>16 Q Ms. Guerrero, would you vote by mail again if you</p> <p>17 knew that your vote would be counted?</p> <p>18 A No. I'm going to go in person.</p> <p>19 Q And did the fact that your vote was rejected</p> <p>20 influence your decision?</p> <p>21 A Yes, because it was -- the signature was real. It</p> <p>22 was not false -- not a false signature or forged signature.</p> <p>23 MS. VELA: Thank you. That's all I have.</p> <p>24 MR. GARZA: I have one more question.</p> <p>25</p> | <p>21</p> <p>1 CHANGES AND SIGNATURE</p> <p>2 WITNESS NAME: _____ DATE OF DEPOSITION: _____</p> <p>3 PAGE LINE CHANGE REASON</p> <p>4 _____</p> <p>5 _____</p> <p>6 _____</p> <p>7 _____</p> <p>8 _____</p> <p>9 _____</p> <p>10 _____</p> <p>11 _____</p> <p>12 _____</p> <p>13 _____</p> <p>14 _____</p> <p>15 _____</p> <p>16 _____</p> <p>17 _____</p> <p>18 _____</p> <p>19 _____</p> <p>20 _____</p> <p>21 _____</p> <p>22 _____</p> <p>23 _____</p> <p>24 _____</p> <p>25 _____</p> |

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| <p>22</p> <p>1 I, MARIA GUERRERO, have read the foregoing deposition</p> <p>2 and hereby fix my signature that same is true and correct,</p> <p>3 except as noted above.</p> <p>4</p> <p>5 _____</p> <p>6 MARIA GUERRERO</p> <p>7 STATE OF _____)</p> <p>8 COUNTY OF _____)</p> <p>9 Before me, _____, on this day personally</p> <p>10 appeared MARIA GUERRERO, known to me (or proved to me under</p> <p>11 oath or through _____) to be the person whose name</p> <p>12 is subscribed to the foregoing instrument and acknowledged</p> <p>13 to me that they executed the same for the purposes and</p> <p>14 consideration therein expressed.</p> <p>15 Given under my hand and seal of office this _____</p> <p>16 day of _____, _____.</p> <p>17</p> <p>18</p> <p>19</p> <p>20 NOTARY PUBLIC IN AND FOR</p> <p>21 THE STATE OF _____</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p> | <p>24</p> <p>1 _____ was not requested by the deponent or a party before</p> <p>2 the completion of the deposition.</p> <p>3 I further certify that I am neither counsel for, related</p> <p>4 to, nor employed by any of the parties to the action in</p> <p>5 which this proceeding was taken, and further that I am not</p> <p>6 financially or otherwise interested in the outcome of the</p> <p>7 action.</p> <p>8 Subscribed and sworn to on this the 29th day of</p> <p>9 July, 2019</p> <p>10</p> <p>11 _____</p> <p>12 Toi K. Dowell, CSR No. 2768</p> <p>13 Certified Expires 12/31/2019</p> <p>14 Integrity Legal Support Solutions</p> <p>15 Firm Registration No. 528</p> <p>16 PO Box 245</p> <p>17 Manchaca, TX 78652</p> <p>18 (512)320-8690</p> <p>19 (512)320-8692 (fax)</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p> |
| <p>23</p> <p>1 UNITED STATES DISTRICT COURT</p> <p>2 SOUTHERN DISTRICT OF TEXAS</p> <p>3 MCALLEN DIVISION</p> <p>4 FEDERICO FLORES, JR., §</p> <p>MARIA GUERRERO, and §</p> <p>4 VICENTE GUERRERO, §</p> <p>Plaintiffs, §</p> <p>5 §</p> <p>§ CIVIL ACTION NO.7:18-cv-113</p> <p>6 §</p> <p>v. §</p> <p>7 §</p> <p>TEXAS SECRETARY OF STATE and §</p> <p>8 ARMANDINA MARTINEZ, ALMA §</p> <p>GARCIA, ALICIA DOUGHERTY NO. §</p> <p>9 1, ALICIA DOUGHERTY NO. 2, §</p> <p>YOLANDA MARTINEZ, §</p> <p>10 Defendants. §</p> <p>11</p> <p>REPORTER'S CERTIFICATE</p> <p>12 ORAL DEPOSITION OF MARIA GUERRERO</p> <p>JULY 25, 2019</p> <p>13</p> <p>14 I, Toi K. Dowell, certified shorthand reporter in and</p> <p>15 for the State of Texas, hereby certify to the following:</p> <p>16 That the witness MARIA GUERRERO was duly sworn by the</p> <p>17 officer and that the transcript of the deposition is a true</p> <p>18 record of the testimony given by the witness;</p> <p>19 I further certify that pursuant to the FRCP Rule</p> <p>20 30(f)(1) that the signature of the Deponent</p> <p>21 x was requested by the deponent or a party before the</p> <p>22 completion of the deposition and returned within 30 days</p> <p>23 from date of receipt of the transcript. If returned, the</p> <p>24 attached Changes and Signature Page contains any changes and</p> <p>25 the reasons therefore;</p> | |